

U.S. Department of Justice



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March 11, 2008

VIA CM/ECF

Honorable Gregory M. Sleet
U.S. District Judge
J. Caleb Boggs Federal Bldg
844 N. King Street, Room 4324
Lockbox 19
Wilmington, DE 19801

**RE: United States v. M.A. Hanna Plastics Groups, Inc., et al.
Civil Action No. 06-409-GMS**

Dear Chief Judge Sleet:

I write on behalf of all counsel in the referenced matter, first as an update to my February 20, 2008 letter to the Court, which was also on behalf of all counsel, and secondly to request a brief telephonic status conference.

In my earlier letter, I advised that the parties had reached agreements in principle to settle this case, and that we are proceeding as quickly as possible to reduce those agreements to writing. Since that date, the Government has drafted two proposed consent decrees, one with M.A. Hanna Plastics, Inc. ("Hanna") and a separate agreement with the Wilmington Economic Development Corporation ("WEDCO"). Those proposals have been forwarded to opposing counsel, the Hanna Consent Decree on February 24, 2008, and the WEDCO Consent Decree on March 6, 2008. I have just received written comments from Hanna, and I assume WEDCO will similarly respond promptly.

In light of the progress made toward a final settlement in this matter, counsel now request a brief teleconference with Your Honor, to discuss removing from the Court's calendar the dates for pretrial submissions and trial. Because the Pretrial Order is due to be filed with the Court on or before March 14, 2008, it would be most helpful to have this teleconference as soon as possible, consistent, of course, with the Your Honor's calendar.

In the alternative, if the Court is content simply to remove the pretrial and trial dates from the calendar without a teleconference, that would certainly be fine with counsel.

We appreciate Your Honor's consideration.

Respectfully,

COLM F. CONNOLLY
United States Attorney

By: /s/Patricia C. Hannigan
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Assistant United States Attorney

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